

James P. Lamoureux Attorney

#### '98 JAN 20 PM 3 56

Room 4066 1200 Peachtree St., N. E. Atlanta, GA 30309 404 810-4196 FAX: 404 810-8629

January 20, 1998

David Waddell Executive Director Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

In Re: BellSouth Telecommunications, Inc.'s Entry into Long Distance (interLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996

Docket No: 97-00309

Dear Mr. Waddell:

Please find enclosed the original and thirteen copies of AT&T's and MCI Telecommunications Corporation's Joint Proposed List of Issues.

Sincerely,

Tim Lamoureux

cc: Parties of record

# BEFORE THE TENNESSEE REGULATORY AUTHORITY Nashville, Tennessee

In Re: BellSouth Telecommunications, Inc.'s	)	
Entry into Long Distance (interLATA) Service in	)	
Tennessee Pursuant to Section 271 of the	)	Docket No. 97-00309
Telecommunications Act of 1996	)	

# AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.'S AND MCI TELECOMMUNICATIONS CORPORATION'S JOINT PROPOSED LIST OF ISSUES

In response to the Notice Of Status Conference issued January 16, 1998, and in order to facilitate discussion at the January 22, 1998 Status Conference, AT&T Communications of the South Central States, Inc. ("AT&T") and MCI Telecommunications Corporation ("MCI") hereby submit the following joint list of issues to be resolved by the Tennessee Regulatory Authority in this proceeding:

- Issue No. 1: Has an unaffiliated competing provider of telephone exchange service requested access and interconnection with BellSouth?
- Issue No. 2: Is Track B available to BellSouth in Tennessee at this time? If not, should its SGAT be rejected and this proceeding dismissed?
- Issue No. 3: Has BellSouth entered into one or more binding agreements approved under Section 252 with unaffiliated competing providers of telephone exchange service in Tennessee?
- Issue No. 4: Is BellSouth providing access and interconnection to its network facilities for the network facilities of such competing providers in Tennessee?

- Issue No. 5: Are such competing providers providing telephone exchange service to residential and business customers either exclusively over their own telephone exchange service facilities or predominantly over their own telephone exchange service facilities in Tennessee?
- Issue No. 6: Is Track A available to BellSouth in Tennessee at this time? If not, should this proceeding be dismissed or continued?
- Issue No. 7: Does BellSouth's Tennessee SGAT comply with each of the provisions of §§ 251 and 252(d) of the Act, and the regulations thereunder, as required by § 252(f) of the Act?
- Issue No. 8: Should BellSouth's SGAT and/or its Tennessee § 271 proceeding be dismissed or held in abeyance until such time as permanent cost-based rates for interconnection and unbundled network elements are established in Tennessee?
- Issue No. 9: Has BellSouth provided interconnection in accordance with the requirements of Sections 251(c)(2) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(i) and applicable rules promulgated by the FCC? (Checklist Item #1)
- Issue No. 10: Has BellSouth provided nondiscriminatory access to network elements in accordance with the requirements of Sections 251(c)(3) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC (Checklist Item #2)
- Issue No. 11: Has BellSouth provided nondiscriminatory access to the ducts, conduits, and rights-of-way owned or controlled by BellSouth at just and reasonable rates in accordance with the requirements of Section 224 of the Communications Act of 1934 as amended by the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(iii) and applicable rules promulgated by the FCC? (Checklist Item #3)
- Issue No. 12: Has BellSouth unbundled the local loop transmission between the central office and the customer's premises from local switching or other services, pursuant to Section 271(c)(2)(B)(iv) and applicable rules promulgated by the FCC? (Checklist Item #4)
- Issue No. 13: Has BellSouth unbundled the local transport on the trunk side of a wireline local exchange carrier switch from switching or other services, pursuant to Section 271(c)(2)(B)(v) and applicable rules promulgated by the FCC? (Checklist Item #5)

- Issue No. 14: Has BellSouth provided unbundled local switching from transport, local loop transmission, or other services, pursuant to Section 271 (c)(2)(B)(vi) and applicable rules promulgated by the FCC? (Checklist Item #6)
- Issue No. 15: Has BellSouth provided nondiscriminatory access to the following, pursuant to Section 271(c)(2)(B)(vii) and applicable rules promulgated by the FCC:
  - (a) 911 and E911 services;
  - (b) directory assistance services to allow the other telecommunications carrier's customers to obtain telephone numbers:
  - (c) operator call completion services? (Checklist Item #7)
- Issue No. 16: Has BellSouth provided white pages directory listings for customers of other telecommunications carrier's telephone exchange service, pursuant to Section 271(c)(2)(B)(viii) and applicable rules promulgated by the FCC? (Checklist Item #8)
- Issue No. 17: Has BellSouth provided nondiscriminatory access to telephone numbers for assignment to the other telecommunications carrier's telephone exchange service customers, pursuant to Section 271 (c)(2)(B)(ix) and applicable rules promulgated by the FCC? (Checklist Item #9)
- Issue No. 18: Has BellSouth provided nondiscriminatory access to databases and associated signaling necessary for call routing and completion pursuant to Section 271(c)(2)(B)(x) and applicable rules promulgated by the FCC? (Checklist Item #10)
- Issue No. 19: Has BellSouth provided number portability, pursuant to Section 271(c)(2)(B)(xi) and applicable rules promulgated by the FCC? (Checklist #11)
- Issue No. 20: Has BellSouth provided nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xii) and applicable rules promulgated by the FCC? (Checklist Item #12)
- Issue No. 21: Has BellSouth provided reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2) of the

- Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xiii) and applicable rules promulgated by the FCC? (Checklist Item #13)
- Issue No. 22: Has BellSouth provided telecommunications services available for resale in accordance with the requirements of Sections 251(c)(4) and 252(d)(3) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xiv) and applicable rules promulgated by the FCC? (Checklist Item #14)
- Issue No. 23: Is BellSouth providing non-discriminatory access to its Operational Support Systems?
- Issue No. 24: Has BellSouth developed performance standards and measurements? If so, have they been implemented and are they being met?
- Issue No. 25: Has BellSouth implemented intraLATA toll dialing parity throughout Tennessee pursuant to Section 271(e)(2)(A) of the Telecommunications Act of 1996?
- Issue No. 26: Has BellSouth met the requirements of Section 271(c)(1)(A) of the Telecommunications Act of 1996?
- Issue No. 27: Has BellSouth met the requirements of Section 271(c)(1)(B) of the Telecommunications Act of 1996?
- Issue No. 28: Has BellSouth met the requirements of Section 272 of the Telecommunications Act of 1996?

### Issue No. 29: Is approval of BellSouth's entry into the interLATA market in Tennessee in the public interest?

Respectfully submitted,

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

Jim Lamoureux

1200 Peachtree Street, N.E. Atlanta, Georgia 30309

(404) 810-4196

Attorney for AT&T Communications of the South Central States, Inc.

MCI TELECOMMUNICATIONS CORP.

Susan Berlin

780 Johnson Ferry Road

Suite 700

Atlanta, Georgia 30342

(404) 267-5874

Attorney for MCI

Telecommunications Corporation.

Dated: January 20, 1998

#### **CERTIFICATE OF SERVICE**

I, James P. Lamoureux, hereby certify that on this 20th day of January, 1998, a true and correct copy of the foregoing has been delivered via U. S. Mail, postage prepaid to the following counsel of record:

James P. Lamoureux

L. Vincent Williams, Esq. Office of the Consumer Advocate Cordell Hull Building, 2nd Floor 426 Fifth Avenue North Nashville, Tennessee 37243-0500

Henry Walker, Esq.
Attorney for American Communications Services, Inc.
Boult, Cummings, Conners & Berry
P. O. Box 198062
Nashville, Tennessee 37219

Guy M. Hicks, Esq. Attorney for BellSouth 333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300

Jon Hastings, Esq. Attorney for MCI Boult Cummings, Conners & Berry P. O. Box 198062 Nashville, Tennessee 37219

Martha McMillan, Esq. Attorney for MCI 780 Johnson Ferry Road, Suite 700 Atlanta, Georgia 30342

Charles B. Welch, Jr., Esq. Attorney for Time Warner, Inc. Farris, Mathews, Gilman,, Branan & Hellen 511 Union Street, Suite 2400 Nashville, TN 37219

Dana Shaffer, Esq. Attorney for NextLink 105 Molloy Street, Suite 300 Nashville, Tennessee 37201 Carolyn Tatum Roddy, Esq. Attorney for Sprint Sprint Communications Co., L.P. 3100 Cumberland Circle - N0802 Atlanta, Georgia 30339

H. Ladon Baltimore, Esq. Attorney for LCI International Telecom Farrar & Bates, L.L.P. 211 Seventh Avenue North Suite 320 Nashville, TN 37219-1823

Thomas E. Allen Vice President-Strategic Planning & Regulatory Policy InterMedia Communications 3625 Queen Palm Drive Tampa, Florida 33619

Jonathan E. Canis, Esq. Enrico C. Soriano Kelley Drye & Warren, LLP 1200 19th Street, N.W. Suite 500 Washington, D.C. 20036

D. Billye Sanders, Esq.Waller, Lansden, Dortch & Davis PLLC511 Union Street, Suite 2100Nashville, Tennessee 37219-1760

Guilford Thornton, Esq. Stokes & Bartholomew 424 Church Street Nashville, TN 37219